

## CHAPTER 16 COMMENT PERIOD EXTENSION REQUESTS

This chapter addresses the EPA's response to public comments requesting a comment period extension for the EPA's Proposed *Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources*.

Commenters also raised issues on topics that are not covered by this chapter. Please refer to the following chapters for responses specific to those issues:

- **Chapter 1:** Source Category
- **Chapter 2:** Regulation of Methane
- **Chapter 3:** Well Completions
- **Chapter 4:** Fugitives Monitoring
- **Chapter 5:** Pumps
- **Chapter 6:** Controllers
- **Chapter 7:** Compressors
- **Chapter 8:** Equipment Leaks at Natural Gas Processing Plants
- **Chapter 9:** Liquids Unloading
- **Chapter 10:** Storage Vessels
- **Chapter 11:** Compliance
- **Chapter 12:** Regulatory Impact Analysis
- **Chapter 13:** Existing State, Local, and Federal Rules
- **Chapter 14:** Subpart OOOO
- **Chapter 15:** Miscellaneous

This section presents the comments received by the EPA requesting various extensions of the comment period.

**Response:** In the proposed rule, we provided for a 60-day comment period ending on November 17, 2015. In response to numerous requests from stakeholders, the EPA extended the comment period to December 4, 2015.

The proposed rules and draft guidance were the outgrowth of more than a year of public engagement that began with five technical white papers the agency issued in April 2014 for peer and public review. The agency noted at that time that it would use those papers, along with the input received from peer reviewers and the public, to determine how to best address additional emissions of volatile organic compounds and greenhouse gases from the sources covered in the papers. The EPA received more than 43,000 public comments on the white papers.

Drawing on the technical white papers and the comment and input we received in response, the Administration on January 14, 2015 announced a strategy to address methane and VOC emissions from the oil and gas industry to ensure continued, safe and responsible growth in U.S. oil and natural gas production. The strategy outlined the steps the Agency planned to take to reduce methane pollution from new sources in this rapidly growing industry, reduce VOCs from existing sources in areas that do not meet federal ozone health standards (many controls to reduce VOCs also reduce methane as a co-benefit), and build on work that states and industry are doing to address emissions from existing sources elsewhere. All of this information demonstrates that technology is now available that can significantly reduce emissions of methane and VOCs from oil and gas activities.

The proposed rules and draft guidance announced in August follow the steps outlined in the strategy and were developed with significant input, through meetings with the regulated industry, nongovernmental organizations, and a structured outreach process with state, local and tribal air agencies that volunteered to participate. The EPA has continued outreach since announcing the proposed rules and draft guidance on August 18, 2015. We held hearings in Dallas, Denver and Pittsburgh to hear comments from the public on the proposals. On November 3, 2015, the EPA announced that we were extending the comment period on the proposed rules to December 4, 2015. We received over 900,000 public comments on the proposal in total.

**The following are excerpts of the specific public comments requesting a comment period extension:**

**Commenter Name:** Steven A. Buffone, Supervisor-Regulatory Affairs

**Commenter Affiliation:** CONSOL Energy Inc.

**Document Control Number:** EPA-HQ-OAR-2010-0505-5132

**Comment Excerpt Number:** 1

**Comment:** CONSOL Energy Inc. (CONSOL) and its subsidiaries are requesting a 60 day extension to submit comments on the proposed emission standards for new and modified sources for the oil and natural gas sector, Docket ID: EPA-HQ-OAR-2010-0505. As a responsible operator, CONSOL requests an extension in order to conduct a full review of the proposed new

standards. These standards will affect our operations. The time extension will allow for a thorough review of the proposed rule in order to compile more substantive comments. The initial comment period of sixty days is not sufficient enough to allow for a complete review and comment assembly, especially given the increased number of proposed regulatory changes affecting the oil and gas industry. Therefore, we request an additional sixty days to thoroughly review the proposed new emissions standards.

**Commenter Name:** Matthew Hite, Vice President of Government Affairs

**Commenter Affiliation:** Gas Processors Association (GPA)

**Document Control Number:** EPA-HQ-OAR-2010-0505-5163

**Comment Excerpt Number:** 1

**Comment:** The Gas Processors Association (GPA) respectfully requests an extension to the comment period for the proposed “Oil and Natural Gas Sector: Emission Standards for New and Modified Sources” published in the Federal Register on September 18, 2015 (80 FR 56593). GPA is requesting the comment period be extended **60-days** beyond the November 17th, 2015 comment period deadline.

The proposed rule revisions expands regulations covering new and modified “field gas gathering systems” under 40 CFR Part 60, Subpart OOOOa. As such, the proposed rule would have significant impact to the GPA membership which owns and operates a significant majority of the “field gas gathering systems” that would be subject to the rule. This rulemaking will have substantial impacts on midstream operations. In addition, this regulation is just one of four regulations EPA proposed simultaneously as part of the President’s “Climate Action Plan” to reduce methane emissions from the oil and natural gas industry. Each of these proposed rules needs to be adequately reviewed to understand the full impacts of each rule as well as the collective impacts of these new regulations.

Many of the same personnel that are working to evaluate this proposed rule are also evaluating EPA’s other proposed rules. As proposed, this rule will have significant financial and resource impact on our members. GPA members possess significant information that is relevant to the proposed rules and additional time is necessary in order to thoughtfully assess, compile, and provide such information to the EPA so that the EPA may consider such information as it works towards finalizing these rules. It is only reasonable to allow an additional 60 days to each of these rule proposals to allow sufficient time to thoroughly review the proposal, fully understand its impacts, and develop thoughtful comments and recommendations.

GPA has worked collaboratively with EPA for many years and is committed to continue in this effort to strive for cost-effective rules that minimize the impact to the domestic energy infrastructure.

We appreciate the agency’s consideration of our request to extend the comment period 60 days and look forward to working with the agency on the final rule. If you have questions please contact me at (202) 279-1664 or by email at [mwhite@gpaglobal.org](mailto:mwhite@gpaglobal.org) or Melanie Roberts, GPA Environmental Committee Chair, at (713) 584-1422 or by email at [mroberts@targaresources.com](mailto:mroberts@targaresources.com).

**Commenter Name:** Andrew Casper, Director of Legal & Regulatory Affairs

**Commenter Affiliation:** Colorado Oil & Gas Association (COGA)

**Document Control Number:** EPA-HQ-OAR-2010-0505-5256

**Comment Excerpt Number:** 3

**Comment:** The Colorado Oil & Gas Association, (COGA), respectfully requests a 90-day comment period extension for the following four Oil and Gas rules and guidelines: (1) Oil and Natural Gas Sector: Emission Standards for New and Modified Sources (80 Fed. Reg. 56,593); (2) Review of New Sources and Modification in Indian Country: Federal Implementation Plan for Managing Air Emissions from True Minor Sources Engaged in Oil and Natural Gas Production (80 Fed. Reg. 56,554); (3) Source Determination for Certain Emission Units in the Oil and Natural Gas Sector (80 Fed. Reg. 56,579); (4) Draft Control Technique Guidelines for the Oil and Natural Gas Industry (80 Fed. Reg. 56,557) (collectively the “Proposals”).

The Proposals have the potential to significantly affect COGA members and their operations. Each of the Proposals is lengthy and complex and will require significant attention in order to prepare meaningful and helpful comments. In our experience, it is rare that four proposals of the kind noted above are issued in conjunction. Individually, each of the Proposals is significant in its breadth and depth. Collectively, they represent a substantial challenge to COGA’s members and the continued viability of their operations. In addition, there are substantial supporting documents and analysis that also warrant review and comment. COGA’s challenges are also complicated by the regulatory regime in Colorado and the implications of such regime require careful consideration. Thus, a 90-day extension for comment on all four Proposals is warranted.

In addition, the Bureau of Land Management, (BLM), is on the precipice of releasing anticipated venting and flaring rules. This rule, while not yet published, likely will contain substantial overlap with aspects of the four Proposals, including with respect to the control of emissions from the same or similar sources. Accordingly, a 90-day comment extension will ideally allow COGA and other trade associations to consider the Proposals in conjunction with the BLM rule once it is finalized. COGA appreciates your consideration of this extension request and looks forward to your response.

**Commenter Name:** Kathleen M. Sgamma, Vice President of Government & Public Affairs

**Commenter Affiliation:** Western Energy Alliance

**Document Control Number:** EPA-HQ-OAR-2010-0505-5287

**Comment Excerpt Number:** 1

**Comment:** Currently, between EPA and BLM, there are at least eight regulatory efforts related either directly or in a connected nature to measuring and reducing methane emissions from the oil and natural gas industry. The regulations proposed by EPA and BLM are complex, highly technical, and closely interrelated, and we must be able to contemplate the full scope of these proposed rules in order to effectively analyze them and provide both agencies with substantive and considered comments. Therefore, we are requesting an extension to each comment period for the proposed rules listed above so that they collectively close ninety days after the release of BLM’s forthcoming Venting and Flaring rule (Onshore Order No. 9,) the last one anticipated for release. Overlapping comment periods and in the case of Onshore Order Number 3 a reopening

of the comment period, are necessary to ensure that we and the agencies can analyze the interrelated nature of these regulations and ensure a deliberative rulemaking process that contemplates the full economic impact collectively of these rules and their impact on American energy production.

Taken together, these proposals from EPA and BLM have potentially far-reaching impacts for the oil and natural gas industry that warrant thoughtful evaluation. EPA and BLM have placed the burden on the oil and natural gas industry to comprehend these numerous, complex regulations and provide the detailed technical data necessary to justify them in a time period that does not allow our industry to fully understand the extent of the proposed regulatory actions. Normally that evidentiary burden is placed on the regulating agency, not on the regulated entity. Because of the length and complexity of the rules and the burden for evidence, we believe a ninety day overlap with BLM's Venting and Flaring rules is a reasonable request.

EPA, in its proposed rules, references extensive coordination with BLM on its Venting and Flaring rule and publicly has presented its rulemaking actions as a package to address oil and natural gas industry emissions. Given this coordinated approach by EPA and BLM, it is only prudent that industry be allowed to evaluate the full package in order to provide meaningful input.

**Commenter Name:** Jack Dalrymple, Governor, et al.

**Commenter Affiliation:** North Dakota Industrial Commission (NDIC)

**Document Control Number:** EPA-HQ-OAR-2010-0505-5319

**Comment Excerpt Number:** 2

**Comment:** On August 18, 2015 the Environmental Protection Agency (EPA) released the August 2015 Proposed Rules and Draft Control Technique Guidelines for the Oil and Natural Gas Industry:

- Proposed New Source Performance Standards - Docket ID number EPA-HQ-OAR-2010-0505
- Draft Control Techniques Guidelines- Docket ID number: EPA-HQ-OAR-2015-0216
- Proposed Source Determination Rule - Docket ID number: EPA-HQ-OAR-2013-0685
- Proposed Federal Implementation Plan for Implementing Minor New Source Review Permitting in Indian Country- Docket ID number: EPA-HQ-OAR-2014-0606

The EPA indicated they would take written comments for 60 days after the proposals were published in the Federal Register.

The documents listed under the four dockets above constitute approximately 1,000 pages that must be reviewed in order to submit constructive comments from the NDIC.

Because of the State of North Dakota's significant oil and gas production and experience in the regulation of oil and gas and the importance of the oil and gas industry to our citizens, the NDIC respectfully requests a 180 day extension of the comment period in order to facilitate the submission of constructive comments.

**Commenter Name:** Margo Thorning, Senior Vice President and Chief Economist

**Commenter Affiliation:** American Council for Capital Formation (ACCF)

**Document Control Number:** EPA-HQ-OAR-2010-0505-5363

**Comment Excerpt Number:** 1

**Comment:** The American Council for Capital Formation (ACCF) respectfully requests 60-day comment period extensions for the Oil and Natural Gas Sector: Emission Standards for New and Modified Sources (80 FR 56593), Review of New Sources and Modifications in Indian Country: Federal Implementation Plan for Managing Air Emissions from True Minor Sources Engaged in Oil and Natural Gas Production (80 FR 56554), Source Determination for Certain Emission Units in the Oil and Natural Gas Sector (80 FR 56579), and the Draft Control Technique Guidelines for the Oil and Natural Gas Industry (80 FR 56557).

The ACCF believes that given the wide reaching cumulative impact of the proposed regulations listed above, a careful analysis is required to have a full picture of both the micro and macro impacts at the industry level as well as for the overall economy. These regulations could be challenging to the industry to provide the energy our nation demands and their impacts must also be considered in conjunction with the impacts of the revised ozone standard and other parts of the “Methane Strategy,” including the pending Bureau of Land Management (BLM) rule, which has not yet been proposed and which will likely require costly methane controls for the very same emission sources.

The ACCF remains committed to working with EPA and the Administration to identify emission control opportunities that are both cost-effective and, when implemented, don’t hinder our ability to provide the energy our nation will continue to demand for many years to come. However, trade associations and operators, need sufficient time to fully analyze the cumulative impacts of these proposed regulations and ensure that they are as cost-effective as possible, thereby minimizing impediments on the production of American energy that would undermine our nation’s competitiveness.

Again, to address the above concerns, the ACCF requests a 60-day comment period extension to each of the proposed regulations. This request is also intended to allow for a 30-day comment period overlap with the pending proposed BLM rule. At the very least, a 30-day comment period extension is necessary for each of these rules to allow additional time for adequate stakeholder input and, if BLM doesn’t release its proposed rule in time to allow for this temporal overlap, EPA should officially allow additional comment once the proposed BLM rule is available and its interrelationship with the EPA proposed regulations can be fully analyzed. We greatly appreciate your consideration of this request and await your favorable response.

**Commenter Name:** Howard J. Feldman, Senior Director; Regulatory and Scientific Affairs, Energy

**Commenter Affiliation:** American Petroleum Institute (API)

**Document Control Number:** EPA-HQ-OAR-2010-0505-5364

**Comment Excerpt Number:** 1

**Comment:** API respectfully requests 60-day comment period extensions for the Oil and Natural Gas Sector: Emission Standards for New and Modified Sources (80 FR 56593), Review of New Sources and Modifications in Indian Country: Federal Implementation Plan for Managing Air Emissions from True Minor Sources Engaged in Oil and Natural Gas Production (80 FR 56554), Source Determination for Certain Emission Units in the Oil and Natural Gas Sector (80 FR 56579), and the Draft Control Technique Guidelines for the Oil and Natural Gas Industry (80 FR 56557).

These proposals are part of the part of the President's "Methane Strategy," which includes regulations and programs from several different agencies. Each of the proposals, including the ones identified above has potentially significant impacts to our industry's operations to individually warrant 60-day comment periods. Yet, collectively, they have the potential to fundamentally challenge our ability to continue providing the energy our nation demands and, as such, will require significant effort to analyze and understand both the impacts of the rules by themselves and their cumulative impacts and interactions. These cumulative impacts must also be considered in conjunction with the impacts of the revised ozone standard and other parts of the "Methane Strategy," including the pending Bureau of Land Management (BLM) rule, which has not yet been proposed and which will likely require costly methane controls for the very same emission sources. EPA has rightly identified numerous important questions in the preambles of each; all of which we need sufficient time to develop a well-considered response. At the same time, we are also preparing comments for the EPA's recently proposed Methane Challenge program.

Our organizations have collaborated well in the past and API remains committed to working with EPA and the Administration to identify emission control opportunities that are both cost-effective and, when implemented, don't hinder our ability to provide the energy our nation will continue to demand for many years to come. However, trade associations and operators, including API, need sufficient time to fully analyze the cumulative impacts of these proposed regulations and ensure that they are as cost-effective as possible, thereby minimizing impediments on the production of American energy that would undermine our nation's competitiveness.

Again, to address the above concerns, API requests a 60-day comment period extension to each of the proposed regulations. This request is also intended to allow for a 30-day comment period overlap with the pending proposed BLM rule. At the very least, a 30-day comment period extension is necessary for each of these rules to allow additional time for adequate stakeholder input and, if BLM doesn't release its proposed rule in time to allow for this temporal overlap, EPA should officially allow additional comment once the proposed BLM rule is available and its interrelationship with the EPA proposed regulations can be fully analyzed. We greatly appreciate your consideration of this request and await your favorable response.

**Commenter Name:** Stan Dempsey, Jr - President

**Commenter Affiliation:** Colorado Petroleum Association

**Document Control Number:** EPA-HQ-OAR-2010-0505-5365

**Comment Excerpt Number:** 1

**Comment:** The Colorado Petroleum Association (CPA) respectfully requests 90-day comment period extensions for the Oil and Natural Gas Sector: Emission Standards for New and Modified Sources (80 FR 56593), Review of New Sources and Modifications in Indian Country: Federal Implementation Plan for Managing Air Emissions from True Minor Sources Engaged in Oil and Natural Gas Production (80 FR 56554), Source Determination for Certain Emission Units in the Oil and Natural Gas Sector (80 FR 56579), and the Draft Control Technique Guidelines for the Oil and Natural Gas Industry (80 FR 56557).

CPA believes additional time is needed as these proposed regulations differ substantially from Colorado's existing methane rule. CPA is also concerned these proposed regulations affect several different agencies and Tribes which have a prominent position in Colorado. CPA respectfully requests that EPA extend the comment period for another 90 days to allow CPA members to provide comments. We also note that the Bureau of Land Management is due to release its venting and flaring rule, which may overlap with EPA's proposal.

**Commenter Name:** James D. Elliott, Counsel

**Commenter Affiliation:** Independent Petroleum Association of America (IPAA)

**Document Control Number:** EPA-HQ-OAR-2010-0505-5366

**Comment Excerpt Number:** 1

**Comment:** The Independent Petroleum Association of America ("IPAA"), for the reasons set forth below, respectfully requests 90-day comment period extensions for the Oil and Natural Gas Sector: Emission Standards for New and Modified Sources (80 Fed. Reg. 56,593); the Draft Control Technique Guidelines for the Oil and Natural Gas Industry (80 Fed. Reg. 56,557); and Source Determination for Certain Emissions Units in the Oil and Natural Gas Sector (80 Fed. Reg. 56,579) published on September 18, 2015.

EPA's simultaneous 60-day comment period for all three proposed regulations/guidelines is inadequate and unfairly limits IPAA and its individual members to evaluate the proposal and provide meaningful comments. With regard to the New Source Performance Standards to regulate methane directly, Subpart OOOOa, EPA has been working on the proposed regulations for nearly two years, if not three (the proposal cites requests for administrative reconsideration of the Subpart OOOO regulations finalized in August of 2012). Providing 60 days to comment on EPA's first attempt to directly regulate methane from the oil and natural gas sector, while proposing two additional regulatory actions that will have significant implications to the oil and natural gas industry, hints, at a minimum, other political forces at work and perhaps even a desire to hamstring industry's ability to provide meaningful comments.

IPAA and other industry representatives' ability to evaluate and respond to the proposals has been hampered by EPA's failure to timely place critical support documents in the docket for public review. In the September 18, 2015 Federal Register publication of the proposed Subpart OOOOa regulations, EPA cites as support for their proposal either the Technical Support Document ("TSD") and/or the Regulatory Impact Analysis ("RIA") approximately 67 times — specifically indicating 15 times that one or both of the documents were currently in the docket and accessible to the public. As of today, the RIA is not included in the docket (it is believed that EPA made the document available on it's website on September 18, 2015). The actual date the



TSD was placed in the docket is less than clear but it appears that the earliest date the document was available to the public was September 24, 2015 and that it a revised version may have been uploaded later. In response to IPAA and other requests for an extension of time to comment, EPA may indicate the pre-Federal Register versions of the documents were available on August 18, 2015, when the Administrator signed the proposals. Without access to the underlying RIA and TSD, the ability to evaluate the reasonableness and appropriateness of the proposal is extremely limited. After making the pre-Federal Register versions of the proposals available to the public which cites the TSD, a request for the TSD was made to EPA. EPA's response to the request was that the TSD was under "final preparation" for submittal to the docket. It is unclear what was meant by final preparation, but the fact remains neither the TSD nor the RIA were available in the docket when EPA published the Federal Register version of the proposal and the 60-day comment periods began.

**Commenter Name:** John Robitaille, Vice President

**Commenter Affiliation:** Petroleum Association of Wyoming (PAW)

**Document Control Number:** EPA-HQ-OAR-2010-0505-5367

**Comment Excerpt Number:** 1

**Comment:** The Petroleum Association of Wyoming (PAW) respectfully requests the Environmental Protection Agency extend the comment period for an additional 60 days on the proposed Oil and Natural Gas Sector: Emission Standards for New and Modified Sources (80 FR 56596) and Source Determination for Certain Emission Units in the Oil and Natural Gas Sector (80 FR 56579).

PAW is currently reviewing the proposed rules, however as they are complex rules with much detail we believe a comprehensive review is necessary. This review will require additional time for our membership to provide comments that are detailed and well thought-out.

**Commenter Name:** Thure Cannon, President

**Commenter Affiliation:** Texas Pipeline Association (TPA)

**Document Control Number:** EPA-HQ-OAR-2010-0505-5412

**Comment Excerpt Number:** 1

**Comment:** The Texas Pipeline Association ("TPA") submits the following request for extension of the comment period on EPA's proposed new Subpart OOOOa rules and revisions to Subpart OOOO. See 80 Fed. Reg. 56593 (Sept. 18, 2015). TPA is an organization composed of 50 members who gather, process, treat, and transport natural gas and hazardous liquids materials through intrastate pipelines in Texas. TPA members will be affected by this rulemaking because they own and operate sources that are covered by Subpart OOOO and that will be covered by the provisions in proposed new Subpart OOOOa.

The proposed revisions to Subpart OOOO, and the new rules that would be imposed pursuant to new Subpart OOOOa, will impose significant new requirements on oil and gas sources owned or operated by TPA members. The proposed Subpart OOOOa rules are voluminous, detailed, and complex. TPA members are currently reviewing the proposed rulemaking materials and preparing comments. Additional time is needed to prepare complete and well-thought out

comments because this is not the only rulemaking proposed by EPA affecting the oil and gas source category and to which TPA is responding at this time. Numerous other significant proposed rules that will have a direct and substantial impact on TPA members are being proposed at the same time and in some cases have the same comment period deadline as these proposed Subpart OOOOa rules. Those regulatory developments include the following pending proposals that directly affect oil and gas sources:

Comments due November 13, 2015: Methane Challenge Program draft framework;

Comments due November 17, 2015: Draft control techniques guidelines for VOC RACT (80 Fed. Reg. 56577, September 18, 2015);

Comments due November 17, 2015: Proposed revisions to source determination rules and new definition of "adjacent" (80 Fed. Reg. 56579, September 18, 2015);

Comments due December 9, 2015: Proposed revisions to test methods, performance specifications, and testing regulations (80 Fed. Reg. 54146, September 8, 2015);

Comments due November 24, 2015: Proposed revisions to hazardous waste generation rules (80 Fed. Reg. 57918, September 25, 2015). In addition, TPA members are also analyzing the impact of EPA's new ozone NAAQS (signed on October 1, 2015) and its potential impact on the attainment status of counties in Texas and the United States.

The employees and consultants who are reviewing and preparing comments on the Subpart OOOO and OOOOa proposals are also evaluating EPA's other proposed rules and developments. Having to submit comments on these separate, voluminous, and complex proposals by the current deadlines will strain company resources and may well result in comments that are not be as helpful or thorough as they could be. The proposals at issue are very important to the natural gas industry and significant effort is needed in order to analyze and comment on the impacts of the rules standing alone, as well as the cumulative impacts and possible interactions of all of the proposals listed above.

For these reasons, TPA requests that EPA extend the comment period to give interested persons sufficient time to thoroughly review this proposal and the other EPA proposals and developments referred to above. An extension of time will enable TPA and other stakeholders to provide helpful and detailed comments that will assist EPA in developing better rules. Accordingly, TPA requests that the comment period for this rulemaking be extended by 60 days, from November 17, 2015 to January 19, 2016.

We appreciate your consideration of this request. Please let me know if you have any questions.

**Commenter Name:** Clement J. Frost, Chairman

**Commenter Affiliation:** Southern Ute Indian Tribal Council

**Document Control Number:** EPA-HQ-OAR-2010-0505-5414

**Comment Excerpt Number:** 1

**Comment:** The Southern Ute Indian Tribe respectfully requests a 60-day comment period extension for the following three proposed regulations and rules:

- Docket ID Number EPA-HQ-OAR-2014-0606; Review of New Sources and Modifications in Indian Country: Federal Implementation Plan for Managing Air Emissions from True Minor Sources Engaged in Oil and Natural Gas Production in Indian Country
- Docket ID Number EPA-HQ-OAR-2010-0505; Oil and Natural Gas Sector: Emission Standards for New and Modified Sources (OOOOa)
- Docket ID Number EPA-HQ-OAR-2013-0685; Source Determination for Certain Emission Units in the Oil and Natural Gas Sector

As an air quality regulatory authority on the Southern Ute Indian Reservation and an owner and operator of oil and gas sources on and off the Reservation, the Tribe is uniquely positioned to provide input on the most effective and efficient means of implementing EPA's oil and natural gas sector emission standards.

These proposed rules and regulations have the potential to significantly affect the Southern Ute Indian Tribe and operators on the Southern Ute Indian Reservation. Due to their technical nature, the length of the proposed rules and regulations, and the number of proposals, additional time is required for the Tribe to provide substantive and meaningful comments that represent both the regulatory and operational interests of the Tribe.

The Tribe appreciates your consideration of this request and looks forward to your response.

**Commenter Name:** Russell V. Randle, Counsel, Squire Patton Boggs (US) LLP on behalf of Atlas Copco North America, LLC

**Commenter Affiliation:** Atlas Copco North America, LLC

**Document Control Number:** EPA-HQ-OAR-2010-0505-5533

**Comment Excerpt Number:** 6

**Comment:** Atlas Copco respectfully requests until December 17, 2015, an additional 30 days, in which to submit its comments on the substance of the detailed rule. That proposal is quite complex. As you know, the proposal notice takes 106 pages in the Federal Register, and involves detailed engineering issues. On some of these detailed engineering issues, EPA has expressly requested comment about the practicality of EPA's approach in the rule.

**Commenter Name:** W. Michael Scott, General Counsel

**Commenter Affiliation:** Trilogy Operating, Inc.

**Document Control Number:** EPA-HQ-OAR-2010-0505-6603

**Comment Excerpt Number:** 62

**Comment:** EPA should grant a 60-day extension to the comment period for the Rules. These Rules are highly technical, and it is unlikely that many businesses (and small entities in particular) have had adequate time to digest the requirements included in the Rules and

understand the implications for their businesses. This is particularly true given that EPA released all three proposed Rules at the same time, and that these Rules, collectively, represent hundreds of pages of highly technical documents. In order to allow these entities to meaningfully participate in the rulemaking process, EPA should extend the comment period by 60 days.

**Commenter Name:** W. Michael Scott, Vice President and General Counsel

**Commenter Affiliation:** CrownQuest Operating, LLC

**Document Control Number:** EPA-HQ-OAR-2010-0505-6703

**Comment Excerpt Number:** 55

**Comment:** EPA should grant a 60-day extension to the comment period for the Rules.

These Rules are highly technical, and it is unlikely that many businesses (and small entities in particular) have had adequate time to digest the requirements included in the Rules and understand the implications for their businesses. This is particularly true given that EPA released all three proposed Rules at the same time, and that these Rules, collectively, represent hundreds of pages of highly technical documents. In order to allow these entities to meaningfully participate in the rulemaking process, EPA should extend the comment period by 60 days.

**Commenter Name:** Bradley C. Cross, President/Partner

**Commenter Affiliation:** Big Star Oil & Gas, LLC

**Document Control Number:** EPA-HQ-OAR-2010-0505-6757

**Comment Excerpt Number:** 54

**Comment:** EPA should grant a 60-day extension to the comment period for the Rules.

These Rules are highly technical, and it is unlikely that many businesses (and small entities in particular) have had adequate time to digest the requirements included in the Rules and understand the implications for their businesses. This is particularly true given that EPA released all three proposed Rules at the same time, and that these Rules, collectively, represent hundreds of pages of highly technical documents. In order to allow these entities to meaningfully participate in the rulemaking process, EPA should extend the comment period by 60 days.

**Commenter Name:** Glenn Prescott

**Commenter Affiliation:** RK Petroleum Corporation

**Document Control Number:** EPA-HQ-OAR-2010-0505-6788

**Comment Excerpt Number:** 55

**Comment:** EPA should grant a 60-day extension to the comment period for the Rules.

These Rules are highly technical, and it is unlikely that many businesses (and small entities in particular) have had adequate time to digest the requirements included in the Rules and understand the implications for their businesses. This is particularly true given that EPA released all three proposed Rules at the same time, and that these Rules, collectively, represent hundreds of pages of highly technical documents. In order to allow these entities to meaningfully participate in the rulemaking process, EPA should extend the comment period by 60 days.

**Commenter Name:** Kari Cutting  
**Commenter Affiliation:** North Dakota Petroleum Council (NDPC)  
**Document Control Number:** EPA-HQ-OAR-2010-0505-6789  
**Comment Excerpt Number:** 4

**Comment:** In addition to API's comments referenced above, NDPC also submits the following specific comments.

In order to fully respond to the issues raised in these broad, high impact, precedent-setting, and complex Proposed Rules, more than 77 days was required to gather the necessary information and fully develop these comments. Nonetheless, NDPC made its best effort to put together these comments in the short time allowed. Furthermore, the Proposed NSPS OOOOa and Proposed Source Determination rules are only a small slice of the pending regulations that the upstream oil and gas industry is facing. EPA has also released proposed Control Technique Guidelines for implementation of the recently lowered ozone national ambient air quality standard, and the Department of Interior, Bureau of Land Management's ("BLM") pending regulatory requirements on federal lands will also add to the cumulative impact to our industry and future operations. Industry groups requested that EPA and the Administration coordinate efforts and extend the comment periods to allow a minimum of 30 days overlap between EPA's methane proposals with the to-be proposed BLM rule in order to thoroughly analyze the potential impacts of both proposals. EPA denied this request. Without this overlap, NDPC and its member companies are denied the opportunity to understand the cumulative impacts; provide meaningful feedback; and avoid conflicting requirements across multiple federal and state regulatory agencies.

**Commenter Name:** W. Jeffrey Sparks  
**Commenter Affiliation:** Discovery Operating, Inc.  
**Document Control Number:** EPA-HQ-OAR-2010-0505-6790  
**Comment Excerpt Number:** 54

**Comment:** These Rules are highly technical, and it is unlikely that many businesses (and small entities in particular) have had adequate time to digest the requirements included in the Rules and understand the implications for their businesses. This is particularly true given that EPA released all three proposed Rules at the same time, and that these Rules, collectively, represent hundreds of pages of highly technical documents. In order to allow these entities to meaningfully participate in the rulemaking process, EPA should extend the comment period by 90 days.

**Commenter Name:** J. Roger Kelley  
**Commenter Affiliation:** Domestic Energy Producer's Alliance (DEPA)  
**Document Control Number:** EPA-HQ-OAR-2010-0505-6793  
**Comment Excerpt Number:** 3

**Comment:** In order to fully respond to the issues raised in these broad, high impact, precedent setting, and complex rulemakings, more than 77 days were required to gather the necessary information and fully develop these comments. Nonetheless, DEPA made its best effort to put together these comments in the short time allowed. Further, the proposed NSPS and Source

Determination rules are only a small slice of the pending regulations that the upstream oil and gas industry is facing. EPA has also released proposed control technique guidelines for implementation of the pending revised ozone air quality standard and pending regulatory requirements from the Department of Interior's BLM on federal lands will also add to the cumulative impact to our industry and future operations. Industry groups requested that EPA and the Administration coordinate efforts and extend the comment periods to allow a minimum of 30 days overlap with the to-be proposed BLM rule. EPA denied this request. Without this overlap, DEPA and its member companies are denied the opportunity to understand the cumulative impacts; provide meaningful feedback; and avoid conflicting requirements across multiple federal and state regulatory agencies.

**Commenter Name:** Josh W. Luig

**Commenter Affiliation:** Veritas Energy, LLC

**Document Control Number:** EPA-HQ-OAR-2010-0505-6797

**Comment Excerpt Number:** 56

**Comment:** These Rules are highly technical, and it is unlikely that many businesses (and small entities in particular) have had adequate time to digest the requirements included in the Rules and understand the implications for their businesses. This is particularly true given that EPA released all three proposed Rules at the same time, and that these Rules, collectively, represent hundreds of pages of highly technical documents. In order to allow these entities to meaningfully participate in the rulemaking process, EPA should extend the comment period by 60 days.

**Commenter Name:** Rick D. Davis, Jr.

**Commenter Affiliation:** Midland Energy, Inc. and Petroplex Energy, Inc.

**Document Control Number:** EPA-HQ-OAR-2010-0505-6801

**Comment Excerpt Number:** 55

**Comment:** EPA should grant a 60-day extension to the comment period for the Rules.

These Rules are highly technical, and it is unlikely that many businesses (and small entities in particular) have had adequate time to digest the requirements included in the Rules and understand the implications for their businesses. This is particularly true given that EPA released all three proposed Rules at the same time, and that these Rules, collectively, represent hundreds of pages of highly technical documents. In order to allow these entities to meaningfully participate in the rulemaking process, EPA should extend the comment period by 60 days.

**Commenter Name:** David McBride

**Commenter Affiliation:** Anadarko Petroleum Corporation

**Document Control Number:** EPA-HQ-OAR-2010-0505-6806

**Comment Excerpt Number:** 3

**Comment:** We are appreciative of the opportunity to offer comments; though, we would like to take the opportunity to request additional time to review and comment on this complicated and lengthy rulemaking. We believe the extension provided by EPA is insufficient to provide the

public with an adequate opportunity to participate as required under the Administrative Procedures Act ("APA").

**Commenter Name:** Ben Shepperd

**Commenter Affiliation:** Permian Basin Petroleum Association

**Document Control Number:** EPA-HQ-OAR-2010-0505-6849

**Comment Excerpt Number:** 108

**Comment:** These Rules are highly technical, and it is unlikely that many businesses (and small entities in particular) have had adequate time to digest the requirements included in the Rules and understand the implications for their businesses. This is particularly true given that EPA released all three proposed Rules at the same time, and that these Rules, collectively, represent hundreds of pages of highly technical documents. In order to allow these entities to meaningfully participate in the rulemaking process, EPA should extend the comment period by 120 days.

**Commenter Name:** Michael Hollis

**Commenter Affiliation:** Diamondback E&P LLC

**Document Control Number:** EPA-HQ-OAR-2010-0505-6869

**Comment Excerpt Number:** 17

**Comment:** EPA should grant a 60-day extension to the comment period for the Rules.

These Rules are highly technical, and it is unlikely that many businesses (and small entities in particular) have had adequate time to digest the requirements included in the Rules and understand the implications for their businesses. This is particularly true given that EPA released all three proposed Rules at the same time, and that these Rules, collectively, represent hundreds of pages of highly technical documents. In order to allow these entities to meaningfully participate in the rulemaking process, EPA should extend the comment period by 60 days.

**Commenter Name:** Dan G. LeRoy

**Commenter Affiliation:** Legacy Reserves Operating LP

**Document Control Number:** EPA-HQ-OAR-2010-0505-6882

**Comment Excerpt Number:** 19

**Comment:** EPA should grant a 60-day extension to the comment period for the Rules.

These Rules are highly technical, and it is unlikely that many businesses (and small entities in particular) have had adequate time to digest the requirements included in the Rules and understand the implications for their businesses. This is particularly true given that EPA released all three proposed Rules at the same time, and that these Rules, collectively, represent hundreds of pages of highly technical documents. In order to allow these entities to meaningfully participate in the rulemaking process, EPA should extend the comment period by 60 days.

**Commenter Name:** Howard J Feldman

**Commenter Affiliation:** American Petroleum Institute

**Document Control Number:** EPA-HQ-OAR-2010-0505-6884

**Comment Excerpt Number:** 3

**Comment:** As we noted in our comment extension request, we again request that EPA officially re-open the docket for all three rulemakings when the proposed BLM methane rule is published in the Federal Register, to allow additional time for public comment once its interrelationship with the EPA proposed regulations can be fully analyzed. Also, given the limited comment period and minimal extension for these complex proposals, API will continue its review and, if warranted, provide supplemental comments to the agency that we request be included in the appropriate docket to protect the record and considered before finalizing the rules.

**Commenter Name:** Howard J Feldman

**Commenter Affiliation:** American Petroleum Institute

**Document Control Number:** EPA-HQ-OAR-2010-0505-6884

**Comment Excerpt Number:** 26

**Comment:** While API appreciates the additional 17 day extension that EPA granted to submit comments, a minimum of 120 days was required to provide an adequate set of comments to a rulemaking as broad, high impact, precedent setting, and complex as these proposed rules. Further, the NSPS rules are only a part of the proposed regulations that our industry is facing. EPA has also released proposed control technique guidelines for implementation of the revised ozone air quality standard and pending regulatory requirements from the Department of Interior's BLM on federal lands will also add to the cumulative impact to our industry and future operations. We urged the EPA and the Administration to coordinate its efforts and strongly encouraged EPA to extend its comment periods to allow a minimum of 30 days overlap with the BLM rulemaking currently under development.

Without this overlap, industry does not have the chance to understand the cumulative impacts and provide meaningful feedback to avoid conflicting requirements across the separate agencies. API has developed as complete a set of comments as time allowed. However, much of the information EPA requested, as well as additional information API wanted to provide is not included because of time limitations.

**Commenter Name:** Denzil R. West, Vice President

**Commenter Affiliation:** Reliance Energy, Inc.

**Document Control Number:** EPA-HQ-OAR-2010-0505-6915

**Comment Excerpt Number:** 17

**Comment:** EPA should grant a 60-day extension to the comment period for the Rules.

These Rules are highly technical, and it is unlikely that many businesses (and small entities in particular) have had adequate time to digest the requirements included in the Rules and understand the implications for their businesses. This is particularly true given that EPA released all three proposed Rules at the same time, and that these Rules, collectively, represent hundreds of pages of highly technical documents. In order to allow these entities to meaningfully participate in the rulemaking process, EPA should extend the comment period by 60 days.



**Commenter Name:** J. Roger Kelley, Director, Regulatory Affairs  
**Commenter Affiliation:** Continental Resources, Inc.  
**Document Control Number:** EPA-HQ-OAR-2010-0505-6963  
**Comment Excerpt Number:** 3

**Comment:** Continental appreciates the agency's decision to engage in a public rulemaking on these important issues; however, the seventy-seven day comment period for the Proposed Rules is wholly inadequate given the widespread and duplicative impacts the Proposed Rules will have on the oil and natural gas sector.

**Commenter Name:** Brandon M. Black, Vice President  
**Commenter Affiliation:** BC Operating, Inc.  
**Document Control Number:** EPA-HQ-OAR-2010-0505-6968  
**Comment Excerpt Number:** 5

**Comment:** Given the technical complexity and potential economic impact of this proposal, we request that EPA extend the comment period by 60 days to allow the industry to fully digest and respond to the proposal.

**Commenter Name:** Brandon M. Black, Vice President  
**Commenter Affiliation:** BC Operating, Inc.  
**Document Control Number:** EPA-HQ-OAR-2010-0505-6968  
**Comment Excerpt Number:** 16

**Comment:** EPA should grant a 60-day extension to the comment period for the Rules.

These Rules are highly technical, and it is unlikely that many businesses (and small entities in particular) have had adequate time to digest the requirements included in the Rules and understand the implications for their businesses. This is particularly true given that EPA released all three proposed Rules at the same time, and that these Rules, collectively, represent hundreds of pages of highly technical documents. In order to allow these entities to meaningfully participate in the rulemaking process, EPA should extend the comment period by 60 days.

**Commenter Name:** Joe Strickling, Operations Manager  
**Commenter Affiliation:** Patriot Resources, Inc.  
**Document Control Number:** EPA-HQ-OAR-2010-0505-6978  
**Comment Excerpt Number:** 4

**Comment:** Given the technical complexity and potential economic impact of this proposal, we request that EPA extend the comment period by 60 days to allow the industry to fully digest and respond to the proposal.

**Commenter Name:** Joe Strickling, Operations Manager  
**Commenter Affiliation:** Patriot Resources, Inc.

**Document Control Number:** EPA-HQ-OAR-2010-0505-6978

**Comment Excerpt Number:** 18

**Comment:** EPA should grant a 60-day extension to the comment period for the Rules.

These Rules are highly technical, and it is unlikely that many businesses (and small entities in particular) have had adequate time to digest the requirements included in the Rules and understand the implications for their businesses. This is particularly true given that EPA released all three proposed Rules at the same time, and that these Rules, collectively, represent hundreds of pages of highly technical documents. In order to allow these entities to meaningfully participate in the rulemaking process, EPA should extend the comment period by 60 days.

**Commenter Name:** Ed Whitfield, Chairman, Subcommittee on Energy and Power, Committee on Energy and Commerce and Doug Lamborn, Chairman, Subcommittee on Energy and Mineral Resources, Committee on Natural Resources

**Commenter Affiliation:** Congress of the United States

**Document Control Number:** EPA-HQ-OAR-2010-0505-7035

**Comment Excerpt Number:** 1

**Comment:** On September 18, 2015, the Environmental Protection Agency (EPA) proposed a suite rules and guidelines that are intended to result in additional reductions in volatile organic compounds and methane emissions from the oil and gas industry. We understand that in addition to these proposed rules and guidelines, the Bureau of Land Management (BLM) inter to propose new methane regulations for the oil and gas sector on federal lands.

To respond to the hundreds of pages of EPA proposed rules, guidelines, and related agency analyses and technical documents, the agency provided the public initially with a 60-day comment period. We understand that in response to requests for a 60-day extension of this period, the agency has granted only a very limited extension from November 17, 2015 to December 4, 2015.

This extension, which includes the Thanksgiving holiday, is inadequate for sufficient public review and comment, given the length and complexity of the proposed EPA regulation guidelines and related documentation, and other ongoing related regulatory actions. We believe additional time is necessary to provide the public sufficient time to review and comment on the Administration's interrelated proposals. We note specifically that the methane regulations expected to be proposed by the BLM have the potential to propose requirements that are conflicting or duplicative, and to create significant uncertainty for future operations in the oil gas sector.

For the foregoing reasons, EPA should provide a full 60-day extension, to January 17, 2016, for comment on the suite of proposed rules and guidelines announced on September 18, 2015. To the extent the BLM moves forward with proposed methane rules, the comment period for these EPA proposed rules and guidelines should also be further extended or reopened to allow the public with at least 30 days to review the EPA and BLM regulations concurrently.

Thank you for your consideration of this request.

**Commenter Name:** Cory Pomeroy, General Counsel

**Commenter Affiliation:** Texas Oil & Gas Association

**Document Control Number:** EPA-HQ-OAR-2010-0505-7058

**Comment Excerpt Number:** 3

**Comment:** Because of the breadth of the issues being addressed by the proposal, and as discussed in our October 26, 2015, request for a comment period extension, TXOGA believes that longer than 75 days is necessary to provide an opportunity for complete input on the proposed regulations. We urge EPA to reopen the comment period to allow for additional input on the proposal.

**Commenter Name:** James M. Inhofe, Chairman, Committee on Environment and Public Works

**Commenter Affiliation:** U.S. Senate

**Document Control Number:** EPA-HQ-OAR-2010-0505-7065

**Comment Excerpt Number:** 2

**Comment:** This a vital industry to our economy, and our recent energy renaissance has provided significant benefits to the American people, while cementing greater energy security. Despite this rapid growth in US oil and gas production, emissions from the sector have continued to decrease, falling for three straight years according to EPA data in the 2014 Greenhouse Gas Reporting Program. Yet, EPA appears to have initiated a regulatory process that could fundamentally undermine this progress and do so on a politically-driven timeline that does not adequately allow for the opportunity to fully consider all of the federal regulatory actions on methane that have been announced. It is of critical importance to avoid unnecessary and detrimental impacts to this vital oil and gas sector when, by EPA's own data, this sector constitutes a very small fraction of total U.S. greenhouse gas emissions.

I understand that EPA has granted a very limited extension to the comment period for this suite of rules. The additional time that you have provided is insufficient to simultaneously review the four rules that directly affect the industry, EPA's voluntary program (the details for which were finally released two weeks ago), and the anticipated BLM rules. As such, I request that the EPA further extend the comment period to 60 days (an additional 43 days beyond the December 4th comment deadline) to allow for comprehensive comments from all interested stakeholders. On other rules with commensurate interest and impacts, such as the original Subpart OOOO rule and the 2015 power plant rules (Clean Power Plan and EGU NSPS Subpart TTTT), EPA granted a 30 day extension and a 60 day extension respectively allowing a total comment period of 90 to 120 days. In both of these examples extensions were given for a single rule, and yet in this instance, stakeholders are forced to provide comments on four related proposed rules that have far reaching implications in a mere 77 days. Plainly stated, this is an insufficient amount of time for stakeholders to appropriately review and respond to the proposed rules.

Along with the regulations EPA has proposed, the Bureau Land of Management (BLM) intends to propose new methane regulations that may cover the very same sources as the EPA s proposed methane rules. Stakeholders should have the opportunity to review and comment on these rules

concurrently. Multi-agency rules have the potential to create significant uncertainty for the future operations of a critical domestic industry due to requirements that are often time conflicting, misaligned, and duplicative. The potential interaction between the EPA and BLM proposals deserves thorough analysis and comprehensive feedback from stakeholders, which can only be possible if these rules are considered at the same time.

To reiterate, EPA should allow a 60 day comment period extension (i.e., an additional 43 days beyond the current 17-day extension to December 4th) to assure adequate time to prepare well-reasoned comments and provide a minimum of 30 days overlap between EPA's and BLM's rule comment periods. In the event that a full 30 days overlap with the proposed BLM rule is not secured during this period, EPA should re-open the proposed rule to allow this overlap in a new 30-day comment period. This will provide stakeholders an appropriate opportunity to contemporaneously review the proposals and provide meaningful comments. Without a comment extension and adequate overlap, I remain greatly concerned that EPA and BLM are pursuing dual processes that would inevitably stifle production, impose a significant compliance burden; and negatively impact American workers and families.

**Commenter Name:** Public Hearing Comments On Proposed Climate, Air Quality, and Permitting Rules for the Oil and Natural Gas Industry; Wednesday, September 23, 2015; 9:10 AM - 8:00 PM; Public Hearing #1 - Dallas, Texas

**Commenter Affiliation:** None

**Document Control Number:** EPA-HQ-OAR-2010-0505-7336

**Comment Excerpt Number:** 6

**Comment:** You can't extend the comment period to 120 days and have phased-in implementation and enforcement. That's absurd. The State of Texas will drag it out for as long as you possibly allow them to. Any deadlines that are set, the state agencies or our attorney general, for instance, will make sure that deadline -- we go up to midnight of the day of that deadline, and they'll drag it out even further in court if they can. So keep the deadlines as short as you can, knowing that that's the only chance for most residents in the state to see relief someday. Thanks very much for being here, and thanks for working on this.

**Commenter Name:** Public Hearing Comments On Proposed Climate, Air Quality, and Permitting Rules for the Oil and Natural Gas Industry; Wednesday, September 23, 2015; 9:10 AM - 8:00 PM; Public Hearing #1 - Dallas, Texas

**Commenter Affiliation:** None

**Document Control Number:** EPA-HQ-OAR-2010-0505-7336

**Comment Excerpt Number:** 59

**Comment:** We urge the EPA and the administration to coordinate their efforts and strongly encourage EPA to extend its comment periods by 60 days to allow a minimum of 30 day overlap with the proposed BLM rule. Without this overlap, industry will not have the chance to understand the cumulative impacts and provide meaningful feedback to avoid conflicting requirements across several agencies.

**Commenter Name:** Public Hearing Comments On Proposed Climate, Air Quality, and Permitting Rules for the Oil and Natural Gas Industry; Wednesday, September 23, 2015; 9:10 AM - 8:00 PM; Public Hearing #1 - Dallas, Texas

**Commenter Affiliation:** None

**Document Control Number:** EPA-HQ-OAR-2010-0505-7336

**Comment Excerpt Number:** 63

**Comment:** In this comment period today, we will provide you with the following assessment, and like the previous speaker, we'd ask that you extend the comment period by at least 60 days to a total of 120 days.

**Commenter Name:** Public Hearing Comments On Proposed Climate, Air Quality, and Permitting Rules for the Oil and Natural Gas Industry; Wednesday, September 23, 2015; 9:00 AM - 7:55 PM; Public Hearing #1 - Denver, Colorado

**Commenter Affiliation:** None

**Document Control Number:** EPA-HQ-OAR-2010-0505-7337

**Comment Excerpt Number:** 29

**Comment:** My first comment concerns the time made available by EPA for written comment. While the Alliance is willing and able to comment on the proposed Source Determination Rule in 60 days, we need significantly more time to comment on Quad Oa NSPS rules, the draft CTGs, and the Indian Country Minor New Source Review Program proposals. We'd ask for an additional 60 days for making our comments on those rules and proposals due in January; January 16, I believe, of 2016. Thank you.

Also, these are high-level comments. More detailed comments can only be prepared after careful examination of the proposals, the regulatory impact analyses, and other important sources of information for these rulemakings as guidelines.

**Commenter Name:** Public Hearing Comments On Proposed Climate, Air Quality, and Permitting Rules for the Oil and Natural Gas Industry; Wednesday, September 23, 2015; 9:00 AM - 7:55 PM; Public Hearing #1 - Denver, Colorado

**Commenter Affiliation:** None

**Document Control Number:** EPA-HQ-OAR-2010-0505-7337

**Comment Excerpt Number:** 161

**Comment:** With respect to the NSPS amendment, while the Alliance is still reviewing the voluminous materials associated with this rule, we have identified several initial concerns that I would like to focus on.

First, as a threshold matter, the Alliance will need more time to review and comment on these rules and is asking for a 60-day extension to do so.

**Commenter Name:** Public Hearing Comments On Proposed Climate, Air Quality, and Permitting Rules for the Oil and Natural Gas Industry; Wednesday, September 23, 2015; 9:00 AM - 7:55 PM; Public Hearing #1 - Denver, Colorado

**Commenter Affiliation:** None

**Document Control Number:** EPA-HQ-OAR-2010-0505-7337

**Comment Excerpt Number:** 182

**Comment:** We urge EPA and the Administration to coordinate their efforts and strongly encourage you to extend the comment period by 60 days, to allow a minimum of 30 days overlap with the proposed BLM rule. Without this overlap, industry will not have the chance to understand the cumulative impacts and provide meaningful feedback to avoid conflicting requirements across federal agencies.

**Commenter Name:** Public Hearing Comments On Proposed Climate, Air Quality, and Permitting Rules for the Oil and Natural Gas Industry; Wednesday, September 23, 2015; 9:00 AM - 7:55 PM; Public Hearing #1 - Denver, Colorado

**Commenter Affiliation:** None

**Document Control Number:** EPA-HQ-OAR-2010-0505-7337

**Comment Excerpt Number:** 190

**Comment:** We do request 60 days' extra time for the comment period.

**Commenter Name:** Public Hearing Comments On Proposed Climate, Air Quality, and Permitting Rules for the Oil and Natural Gas Industry; Tuesday, September 29, 2015; 9:05 AM - 8:00 PM; Public Hearing #1 - Pittsburgh, Pennsylvania

**Commenter Affiliation:** None

**Document Control Number:** EPA-HQ-OAR-2010-0505-7338

**Comment Excerpt Number:** 112

**Comment:** We urge the EPA and the Administration to coordinate their efforts and strongly encourage the EPA to extend its comment periods by 60 days to allow a minimum of 30 days overlap with the proposed BLM rule. Without this overlap, industry will not have the chance to understand the cumulative impacts and provide meaningful feedback to avoid conflicting requirements across the separate agencies.